

**Before the
FEDERAL COMMUNICATION COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Revision of the Commission's Rules to |) | |
| Ensure Compatibility With Enhanced 911 |) | CC Docket No. 94-102 |
| Emergency Calling Systems |) | |
| |) | |
| Amendment of Parts 2 and 25 to Implement the |) | |
| Global Mobile Personal Communications by |) | |
| Satellite (GMPCS) Memorandum of |) | |
| Understanding and Arrangements; Petition of the |) | |
| National Telecommunications and Information |) | IB Docket No. 99-67 |
| Administration to Amend Part 25 of the |) | |
| Commission's Rules to Establish Emissions |) | |
| Limits for Mobile and Portable Earth Stations |) | |
| Operating in the 1610-1660.5 MHz Band |) | |

**911 CALL CENTER PRE-IMPLEMENTATION
STATUS REPORT OF TELENOR SATELLITE SERVICES, INC.**

Telenor Satellite Services, Inc., on behalf of itself and its affiliates Telenor Satellite, Inc., Telenor Satellite Services Holdings, Inc., GMPCS Personal Communications, Inc., and Marlink, Inc. (collectively, "Telenor"), hereby files its 911 Call Center Pre-Implementation Status Report in the above-referenced proceeding. The Commission in its recent Order required that mobile satellite service ("MSS") carriers file these reports in anticipation of the February 11, 2005, effective date of the Commission's 911 call center requirements.¹

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, IB Docket No. 99-67, *Second Report and Order*, FCC 04-201 (released Aug. 25, 2004).

In the Public Notice released on September 24, 2004, the Commission specified the information that carriers are required to provide in this interim report.² In accordance with that directive, Telenor hereby provides the following information:

(a) Carrier Identification Information

Telenor Satellite Services, Inc. ("TSSI"), is a facilities- and resale-based MSS carrier providing services using its own network of land earth stations located at Southbury, Connecticut, Santa Paula, California, and Eik, Norway, utilizing space segment provided by the Inmarsat, Intelsat, AMOS-2, Iridium, and New Skies satellite systems. GMPCS Personal Communications, Inc. and Marlink, Inc. are resale-based MSS carriers that resell the services of various MSS providers.³ TSSI, GMPCS, and Marlink are all wholly-owned subsidiaries of Telenor Satellite Services Holdings, Inc.

This report is filed by the following:

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² International Bureau Announces Procedures for Filing Mobile Satellite Service 911 Call Center Pre-Implementation Status Reports, *Public Notice*, DA 04-3064, Report No. SPB-210 (released Sept. 24, 2004).

³ Under the criteria established by the Commission in the original MSS E-911 Order, non-facilities based resale MSS carriers "have an obligation to ensure access to 911 services to the extent that the underlying facilities-based licensee offers access to 911 service." The call center solution discussed herein currently being established by TSSI will apply with respect to both the facilities-based operations of TSSI and the resale-based operations of GMPCS and Marlink. See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, IB Docket No. 99-67, *Report and Order and Second Further Notice of Proposed Rulemaking*, FCC 03-290 (released Dec. 1, 2003), at ¶ 26.

(b) Carrier Coverage Area

The coverage of the MSS services provided by TSSI, GMPCS, and Marlink is global. Thus, the entire United States is covered by the carriers' services.

(c) Basic Call Center Information

Telenor will integrate its 911 call center operations into its existing 24-hour customer care center located at its headquarters in Rockville, Maryland. Telenor's customer care center is staffed 24 hours a day, 365 days a year, by experienced employees trained to handle a range of emergency and other types of situations. Customer care representatives routinely respond to calls from MSS users throughout the world. They have immediate access to a number of computer networks such as Inmarsat and Iridium databases as well as the internet. Telenor plans to purchase a subscription for access to a PSAP database. Telenor is currently in the process of evaluating the PSAP databases offered by several vendors and will be selecting one within the next several weeks. Once access to a PSAP database is secured, it will be available for use by all Telenor customer care representatives as needed.

Inmarsat has configured its network so that the calling code "91" made on a mobile earth terminal is custom configurable by each land earth station to carry out a particular function. Telenor has configured its land earth station network such that any calls placed from an Inmarsat mobile earth terminal to "91" that is directed by the user to the Telenor station at Southbury, Santa Paula, or Eik will be immediately switched to

Telenor's customer care call center.⁴ The second "1" dialed by the user (*i.e.*, the third digit in a 9-1-1 call) will be superfluous and will have no effect on the call being placed.

When the 911 call comes into the Telenor customer care center, it will ring on a specific line designated for 911 use. The representative answering the call will ask the caller for his or her location. The MSS services currently offered by Telenor do not provide the capability to ascertain the location of user terminals by any measure narrower than ocean region, so the customer care representative will be required to rely on the caller to provide location information orally.⁵ Once the caller has provided the customer representative with his or her location, the representative will enter this information into the PSAP database to determine the telephone number for the appropriate public safety entity for the caller's location. The representative will then transfer the caller to that number. At that point, Telenor's role in the process is completed.

(d) Communication With Customers

In order to communicate the availability of 911 service availability to users, Telenor will provide the appropriate notification to its customers by means of an insert included with billing statements. Telenor plans to insert this communication with bills

⁴ The Inmarsat network is generally configured as an "open system," meaning that users can, except under limited circumstances when terminals are locked into accessing a particular earth station or stations, dial a code to access any land earth station visible to the satellite being used. Telenor is, consequently, only able to ensure that "911" calls will be directed to its customer care center if such calls are placed via a Telenor land earth station.

⁵ New MSS services slated to come on-line in the next several years, particularly Inmarsat's anticipated 4th generation Broadband Global Area Network (BGAN) service, will feature GPS terminal location capabilities. It is not clear at this early stage whether the Commission's 911 requirements will apply to this new service. If it is determined that it does apply, Telenor will reconfigure its network at the appropriate time to ensure compliance with the Commission's rules.

sent to customers during January 2005. Telenor will also publicize the availability of 911 service on its web site and via "The Source," Telenor's on-line resource for its network of service providers and agents.

(e) Problems Organizing Call Center

Telenor has not met with any significant problems with respect to the implementation of its 911 call center obligations.

Respectfully submitted,
TELENOR SATELLITE SERVICES, INC.

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